

**THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

IN RE:

SHARON LATIMER

DEBTOR(S)

) CHAPTER 13  
 ) CASE NO: 14-53193  
 )  
 ) ALAN M. KOSCHIK  
 ) BANKRUPTCY JUDGE  
 )  
 ) TRUSTEE'S OBJECTION TO DEBTOR(S)  
 ) MOTION TO MODIFY CHAPTER 13 PLAN AND  
 ) MOTION TO INCUR DEBT  
 ) TRUSTEE'S REQUEST FOR HEARING  
 )

Now comes Keith L. Rucinski, the Chapter 13 Trustee, and hereby objects to the

Debtor(s) Motion to Modify Plan and Motion to Incur Debt

Debtor(s) Motion to Complete Plan Earlier than the Applicable Commitment Period

The debtor(s) have not supplied sufficient information for the Trustee to evaluate whether the modification represents the debtor(s) best efforts pursuant to 11 USC Section 1325(b)(1)(B). The Trustee requests that the debtor provide additional documents so the proposed modification may be evaluated. The additional documents requested are:

Updated paystubs for the debtor(s)

The most recent filed tax return for the debtor(s)

Any other documentation related to the requested modification (i.e. 401k documentation, settlement statement on another lawsuit, proof of contribution from a family member, etc.)

Amended Schedules I and J

Affidavit of Family Member or Friend supplying funds to the debtor(s)

X Must list terms of modification within the motion to modify, not just by amended plan, as modification is post-confirmation.

The interest rate for the surrendered vehicle stated in the special provisions section of the amended plan is 2.25%; however the interest rate being paid on the vehicle is 5.25% per the order filed on July 8, 2015.

Need amended I and J showing proposed car payment and proposed lowered Chapter 13 payment.

**CHAPTER 13**  
Keith L. Rucinski  
Trustee  
One Cascade Plaza,  
Suite 2020  
Akron, OH 44308  
(330)762-6335  
Fax  
(330)762-7072

WHEREFORE, the Trustee hereby requests the Court sustain the Trustee's objection if these documents and other information are not provided to the Trustee's Office and further requests a hearing on this matter.

Respectfully submitted,

**/s/ Keith L. Rucinski**

Keith L. Rucinski, Chapter 13 Trustee

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Trustee

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CERTIFICATE OF SERVICE

I hereby certify that on 07/12/2018, the following were served a copy of this pleading:

Via Regular Mail

SHARON LATIMER  
250 KING STREET  
RAVENNA, OH 44266

Via ECF

MARC E DANN, ESQ ()  
Office of the US Trustee (ustpregion09.cl.ecf@usdoj.gov)  
Keith L. Rucinski. Chapter 13 Trustee (krucinski@ch13akron.com)

Date of Service: 07/12/2018

By: J. Neunz  
Office of the Chapter 13 Trustee

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